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February 4, 2015

Postal Regulatory Commission
Clerk's Office
901 New York Ave
Washington, D.C.

Re: C2015-1 Center for Art and Mindfulness, Inc. et al. v United States Post Office et al.

Dear Clerk of Court:

I am filing the attached Motion for Late Filing on behalf of the Center for Art and Mindfulness, Inc. and Norton Hazel to request an extension to file a response to the USPS's Motion to Dismiss filed on January 20, 2015 in the above matter.

I was granted an extension to file the Response to the Motion to Dismiss until 2/2/2015 by Order of the PRC dated January 29, 2015, since the undersigned has been out of the country from 1/22/2015 and returned on 1/31/2015.

Upon my return to the area, NJ and CT (where I live) experienced a snow storm that started in Sunday night and continued through Monday. As a result of the emergency ban on travel in CT on Monday, I was not able to complete the brief until Monday night and had to file it at that time. Due to technical difficulties with the PRC's new web site the filing was not accepted on 2/3/2015. The filing was refiled on the evening of Tuesday 2/3/2015 and accepted for filing this morning at the PRC.

I respectfully ask the PRC to grant this Motion for Late Filing under the circumstances.

Very truly yours,

/s/ Drew Backstrand

Drew S. Backstrand

cc: Debra Sherwood, Executive Director

Norton Hazel

**BEFORE THE
POSTAL REGULATORY
COMMISSION WASHINGTON,
D.C. 20268**

Center for Art and Mindfulness, Inc.

and

Norton Hazel

DOCKET NO: C2015-1

Plaintiffs
FILING

MOTION FOR LATE

vs.

United States Post Office

Peter Donoghue, Postmaster General of the United

States and Louis R. Cappelli Limited Partnership

III Defendants

**MOTION FOR LATE FILING: RESPONSE TO MOTION TO DISMISS
FILED BY THE UNITED STATES POSTAL SERVICE**

1. The Plaintiffs filed a five count Complaint against the United States Post Office and two other defendants on December 29, 2014. The Defendant United States Postal Service filed a Motion to Dismiss on January 20, 2015. I was out of the country since January 22, 2015 and returned on January 31, 2015. The undersigned filed and received an extension to file the Response to the Motion to Dismiss of the USPS on

February 2, 2015. (Docket Order No. 2334 filed on 1/29/2015). I arrived home late on 1/31/2015. There was a snow storm on Sunday night 2/1/2015 and Monday, February 2, 2015 in NJ and Connecticut which resulted in no travel over roads in NJ and Connecticut for some time on Monday February 2, 2015. As a result, the undersigned was unable to travel to his office from his home in Greenwich, Connecticut. In addition, the undersigned had trouble filing the Response to the Motion to Dismiss on the new PRC web site when filing it on Monday night February 2, 2015. The Response was filed with the PRC Docket on Tuesday, February 3, 2015 and was accepted at the PRC on February 4, 2015, subject to receiving a Motion for Late Filing by the undersigned.

This is not filed to hinder or delay the proceeding in any way but for good cause because of the snow storm in the NJ and Connecticut area on Sunday night February 1, 2015 and Monday February 2, 2015.

February 4, 2015

/s/ Drew S. Backstrand

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